

**United States District Court  
Southern District Of New York**

Melinda Serin, Judson Russ, Long Soui Lim,  
Peri Kettler, Gordon Redner, and Thomas J. Smith, }  
Plaintiffs }  
v. }  
Northern Leasing Systems, Inc., Jay Cohen, }  
Rich Hahn, and Sara Krieger }  
Defendants }  
No. 06 CV 1625 (SCR)

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**Attorneys' Affirmation In Opposition to**

**Defendants' Motion To Dismiss Amended Complaint**

Krishnan Chittur, an attorney duly admitted to the bar in New York, hereby solemnly affirms and states under penalty of perjury:

1. I am a principal of Chittur & Associates, P.C., attorneys of record for the Plaintiffs herein.
2. Attached herein are true and correct copies of the following documents:
  - a. Exhibit 1 - Mailings referred to in the Amended Complaint;
  - b. Exhibit 2 - Reports in News Media:
    - i. S. Kelleher, *Merchants Complain Credit-Card machine peddlers trap them into costly leases*, The Seattle Times, Oct 19, 2008;
    - ii. Transcript of *Is a Corporation Scamming Small Businesses?*" broadcast on New York channel 7 (ABC News) on May 17, 2007;
    - iii. Transcript of "*Alleged Fraud Targeting Small Businesses?*" (broadcast on New York channel 7 (ABC News) on June 12, 2007);
    - iv. C. Young, "*Nationwide scheme' in Orange County: 2 businesses say leasing company altered contracts*," Times Herald-Record, Feb. 24, 2008.

- c. Exhibit 3 - News Releases from Attorney General of Missouri:
  - i. *“Firm that leases credit Card machines defrauded small businesses in Missouri of thousands of dollars, Nixon says”;*
  - ii. *“Firm that leases credit Card machines to pay \$25,000 in restitution, \$5,000 to the state in agreement with Nixon.”*
- d. Exhibit 4 - Decision of New York State Supreme Court, New York County, Justice Jane S. Solomon in *Northern Leasing Systems, Inc. V. Tirner*, I. No. 602006/04 (Oct. 15, 2008).

Dated: New York, New York  
January 14, 2009

/S/  
Krishnan Chittur, Esq.